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June 15, 2020

Via ECF- Letter Motion

The Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court, Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Vuppala v. J.P.G., LLC, et al.
Case No.: 19-cv-04233-ALC

Dear Judge Carter:

We represent Defendant, J.P.G. LLC, in the above-captioned matter. We write jointly with Plaintiff's counsel, brad Weitz, Esq., and c-defendant's counsel, Jeffrey Chancas, Esq., seeking an extension of the existing stay in this matter that is scheduled to expire on June 15, 2020.

As we stated in our prior letter, due to the ongoing national health crisis caused by the COVID-19 pandemic, coupled with the mandated closure of non-essential public businesses in New York City, which has adversely affected the business in this matter, it is very difficult for the parties to proceed in this matter with discovery and productive settlement negotiations at this time.

Therefore, the parties jointly hereby respectfully request that the Court grant an additional sixty (60) day stay of all deadlines and/or any conference in this matter. The undersigned has conferred with all counsel who join in on this request. We thank you for your attention and consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joseph J. DiPalma
Joseph J. DiPalma

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
June 16, 2020